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June 13, 2012

VIA TELEFAX

Hon. William H. Pauley
United States District Judge
United States District Court
500 Pearl Street
Room 2210
New York NY 10007-1312

Re: Epstein v. Hartford
09 CV 5608 (WHP)

Dear Judge Pauley:

We are counsel to plaintiff in the above-referenced action. ~~We write on behalf of both parties. The parties hereby seek permission to file our cross-motions for summary judgment today as presently scheduled, but to have an additional two weeks, until June 27, 2012, to file the joint 56.1 statement.~~ The parties have made great strides in negotiating the joint statement, but need additional time to finalize the statement. The request will not otherwise affect the briefing schedule. Presently, opposition briefs are due July 11, 2012, and reply briefs are due August 24, 2012.

The moving briefs were originally due on May 18, 2012. They were then extended to June 6, 2012, and then again to June 13, 2012. This represents the third request for an extension from the parties.

If you have any questions, please do not hesitate to give me a call.

Sincerely yours,


Scott M. Riemer

Application granted.

SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.

cc. Michael H. Bernstein, Esq.

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CHAMBERS OF
WILLIAM H. PAULEY
U.S.D.J.

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